

In response to your request, FEMA reviewed all available facts and has determined that there is no basis or avenue for reversal or reconsideration of the determination to disallow the State of Illinois' application to the competitive PDM grant program. This review confirms that the issue related to the application submission was not technical or related to the grants system itself. The State of Illinois failed to finalize the application process by submitting a *completed* application by the deadline, which was January 31, 2019, 3:00 PM EST. FEMA strongly encourages the State of Illinois to take an active role in preparing for the upcoming and subsequent application periods by attending the multiple trainings offered from FEMA Headquarters and the FEMA Regional Office.

Per your request, below are the answers to questions re: Illinois FY 2018 PDM:

- **What caused FEMA to reject Illinois' application to participate in the FY 2018 PDM Program?**

FEMA did not reject the State of Illinois' application. The State of Illinois failed to complete and submit their application by the deadline, which was Jan 31, 2019, 3:00PM EST.

- **What action is FEMA taking to review the decision to deem Illinois' ineligible for the FY 2018 PDM Program?**

As detailed further below, FEMA conducted extensive research to determine that the application was not completed by the deadline and provided that information to the State of Illinois. Five other states, tribes and/or territories also missed the deadline and were treated similarly, i.e. they were not allowed to submit late applications.

- **Since FEMA has previously stated that it does not know what caused the Illinois FY 2018 PDM Program application to be rejected, how does FEMA know the application submission was not hindered by a technical issue?**

This is not an accurate summary of FEMA 's conversations regarding the eGrants system and causation. FEMA has conducted extensive research, reviewed server logs, and provided screenshots indicating which portions of the application needed to be completed prior to the deadline to ensure acceptance. This research confirms that the issue is not technical or related to the system itself. It is a routine user issue when all information is not provided, and the application is incomplete. The system shows "Incomplete Application. " The eGrants system performs validation checks for completeness and accuracy. The "incomplete application " message is not a system IT error.

According to FEMA 's server logs database, most of the subgrants were submitted to the State of Illinois in November and December, matching the state-designated deadline of December 18, 2018. However, the State of Illinois did not "approve " subgrant applications in the database until January 30, 2019, and did not begin to attach subgrant applications to the grant application until January 31, 2019 - a few hours prior to the deadline - which meant that the State of Illinois did not have time to attach all subgrant applications before the deadline.

Consistent with FEMA 's technical assistance trainings given throughout 2018, many problems are not exposed by the system until a subgrant application is approved and an attempt is made to attach it to the grant application, which is why FEMA repeatedly advised Applicants to submit their applications well before the deadline to allow sufficient time for this process. While the State of Illinois had more than a month (from December 18, 2018 - January 31, 2019) to work on this process, they did not initiate the subgrant application approval process until hours prior to the application deadline on January 31, 2019.

- **On what date did FEMA realize that there were imperfections with the Illinois FY 2018 PDM Program application and what steps did FEMA take to help the State of Illinois perfect its FY 2018 PDM Program application?**

It is the Applicant's responsibility to ensure that their application is accepted by the eGrants system by the deadline of January 31, 2019. During the FY 2018 PDM grant application period, FEMA engaged in extensive outreach to generally assist applicants in completing their applications by the deadline and reached out specifically to the State of Illinois as follows:

- *FEMA provided one additional month for Applicants to submit a grant application to FEMA (4 month application period)*
- *FEMA provided 12 technical assistance webinars from August - September 2018. Over 1100 individuals from across the country attended these sessions, however, the State Hazard Mitigation Officer (SHMO) from the State of Illinois attended none of these webinars.*
- *FEMA made two Region V staff in-person visits to the State of Illinois:*
 - o *From September 11-13, 2018, two FEMA Region V staff went in-person to Springfield, Illinois to provide information on the process.*
 - o *From December 5-6, 2018, FEMA Region V staff provided in-person training in Springfield, Illinois on how to develop a quality Hazard Mitigation Assistance (HMA) application.*
- *FEMA provides technical assistance year-round, 24/7 via email and phone, including:*
 - o *The Hazard Mitigation Assistance Helpdesk is available 24/7 via phone and email year round*
 1. HMAGrantsHelpline@fema.dhs.gov
 - 1-866-222-3580
 - o *The Benefit-Cost Analysis Helpdesk is available 24/7 via phone and email year round*
 1. BCHelpline@fema.dhs.gov
 - 1-855-540-6744
 - o *The eGrants Helpdesk is available 24/7 via phone and email year round*
 1. MTeGrants@fema.dhs.gov
 - 1-855-228-3362
- *Reviewing Subapplications is covered in the FEMA Mitigation eGrants System Applicant Quick Reference Guide and the MT eGrants Reviewing and Ranking Subapplications Job Aid both available at <https://www.fema.gov/media-library/assets/documents/160596> and well publicized in the webinars.*

Unfortunately, the first interaction the State of Illinois had with the MT eGrants system technical lead indicating there was a problem with its submission was two days before the closing of the application period on Tuesday, January 29, 2019.

- **How many and which state, tribal, and other governments have been denied the ability to participate in the FY 2018 PDM Program? Why were these governments denied participation?**

No one was denied participation by FEMA. Despite the requirements FEMA outlined in the Notice of Funding Opportunity (NOFO), published on August 3, 2018, six states, tribes, and/or territories (Applicants) failed to complete and submit their applications by the deadline, which was January 31, 2019 3:00PM EST

- **Following the January 31, 2019, application deadline for the FY 2018 PDM Program, did any state, tribal, or other government application for the program receive any changes, updates, or corrective action? If so, for which governments and what dates did such changes, updates, or corrective action take place?**

Yes. 18 potential Applicants including states, tribes, and/or territories were given until March 15 to correct and complete the application process. Applicants experienced FEMA IT error conditions, requiring FEMA to review all issues that prevented these applications from being submitted according to the deadline. Mitigation took the following steps:

- Accepted late grant sub applications from Applicants who experienced technical system problems with the MT eGrants system that were beyond their control and were actively working with the helpdesk or FEMA regions prior to the deadline.*
 - o A technical system issue is a bug or system function that prevented a complete application from being submitted without FEMA intervention.*
- Allowed the correction of applications from a territory and a state that were submitted to the wrong program in eGrants (LPDM platform).*
- Allowed applications in progress at the deadline from three states and one tribe actively working with the helpdesk prior to the deadline.*
- Allowed edits to submitted applications at the deadline with missing sub applications from two states and one tribe.*
- Disallowed late submissions from the six states, tribes, and/or territories (Applicants) that did not have technical system problems.*

- Following the January 31, 2019, application deadline for the FY 2018 PDM Program, were any state, tribal, or other government applications submitted and accepted to participate in the FY 2018 PDM Program?**

Late applications were not accepted. The only exception is if there was an IT error on FEMA's end and applications were accepted from Applicants who experienced technical system problems with the MT eGrants system that were beyond their control and were actively working with the helpdesk or FEMA regions prior to the deadline.

- What actions is FEMA taking to ensure that application submission issues do not happen again in the future for the FY 2018 PDM Program? Since FEMA has stated they do not know what caused the FY 2018 Illinois PDM Program application to be rejected by the online grants system, how can any corrective action be effective?**

This is not an accurate summary of FEMA's conversations regarding the eGrants system and causation. FEMA has conducted extensive research, reviewed server logs, and provided screenshots indicating which portions of the application needed to be completed prior to the deadline to ensure acceptance. To submit an application, all subgrant applications must be complete. At the time of the deadline for application submissions, the State of Illinois had not completed all of the subgrant applications. An incomplete application triggered a normal notification message to the user that the application was incomplete. This research confirms that the issue is not technical or related to the system itself. It is a routine user issue when all information is not provided, and the application is incomplete. The system shows "Incomplete Application." The eGrants system performs validation checks for completeness and accuracy. The "incomplete application" message is not a system IT error. The State of Illinois failed to complete and submit their application by the deadline which was January 31, 2019, 3:00PM EST.

There is corrective action that the State of Illinois can take to ensure that it does not happen again. In upcoming years, the State of Illinois should attend the technical assistance webinars provided and be proactive in submitting their application well before the deadline so the system can review the application for completeness and the State of Illinois can submit an on-time application. The State of Illinois should also contact the FEMA Helpdesks for assistance well before the deadline, as needed:

The Hazard Mitigation Assistance Helpdesk is available 24/7 via phone and email year round
HMAGrantsHelpline@fema.dhs.gov
1-866-222-3580

The Benefit-Cost Analysis Helpdesk is available 24/7 via phone and email year-round.
BCHelpline@fema.dhs.gov
1-855-540-6744

The eGrants Helpdesk is available 24/7 via phone and email year-round.
MTeGrants@fema.dhs.gov
1-855-228-3362

FEMA encourages of the State of Illinois to submit their application for the upcoming FY 2019 PDM grant program application cycle. FEMA places a high value on mitigation and will continue to improve and streamline the PDM program to ensure that funding goes where it is most needed.